

SILVERMANACAMPORA LLP

Proposed Counsel to the Official Committee
of Unsecured Creditors
100 Jericho Quadrangle, Suite 300
Jericho, New York 11753
(516) 479-6300
Kenneth P. Silverman
Ronald J. Friedman
Gerard R. Luckman
Brian Powers

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

-----X

In re:

Chapter 11

DOWLING COLLEGE f/d/b/a DOWLING
INSTITUTE f/d/b/a DOWLING COLLEGE
ALUMNI ASSOCIATION f/d/b/a CECOM
a/k/a DOWLING COLLEGE, INC.

Case No. 16-75545 (REG)

Debtor.

-----X

**COMMITTEE'S STATEMENT REGARDING
CERTAIN OF THE DEBTOR'S FIRST DAY MOTIONS**

The Official Committee of Unsecured Creditors (the "**Committee**") of Dowling College f/d/b/a Dowling Institute f/d/b/a Dowling College Alumni Association f/d/b/a Cecom a/k/a Dowling College, Inc. (the "**Debtor**"), by and through its counsel, SilvermanAcampora LLP, submits this statement with respect to certain of the Debtor's "First Day" motions (the "**Motions**"), and respectfully sets forth and represents as follows:

BACKGROUND

1. On November 28, 2016 (the "**Petition Date**"), the Debtor filed a voluntary petition under chapter 11 of the Bankruptcy Code in this Court.
2. On December 9, 2016, the Office of the U.S. Trustee filed a *Notice of Appointment of Creditors' Committee* (ECF Doc. No. 85) appointing Ultimate Power Inc., Linda Ardito, and Lori Zaikowski to the Committee. The Committee has selected SilvermanAcampora LLP as its proposed counsel.
3. The Debtor is authorized to remain in possession of its property and to continue

in the operation and management of its business as a debtor-in-possession under Bankruptcy Code §§ 1107 and 1108.

4. To date, no trustee or examiner has been appointed in this matter.

THE FIRST DAY MOTIONS

5. The Committee has reviewed all of the Debtor's first day motions, and met to discuss the Committee's position with respect to those motions. After consultation with its counsel, the Committee has determined that it does not object to the entry of final orders granting the following motions:

- Application to retain RSR Consulting, LLC (ECF Doc. No. 7);
- Motion to approve proposed cash management system (ECF Doc. No. 10);
- Motion to authorize payment of employee benefits (ECF Doc. No. 11);
- Motion to approve insurance premium financing agreement (ECF Doc. No. 12);
- Application to employ Douglas Elliman as real estate broker (ECF Doc. No. 16);
- Motion to reject certain unexpired leases (ECF Doc. No. 20); and
- Motion to establish interim compensation procedures for estate professionals (ECF Doc. No. 21).

6. With respect to the aforementioned Motions, the Committee believes that the relief sought in such Motions is necessary and in the best interests of the Debtor's estate.

WHEREFORE, the Committee respectfully requests that the Court grant the Motions as presented by the Debtor.

Dated: Jericho, New York
December 13, 2016

SILVERMANACAMPORA LLP
Proposed Counsel to the Official Committee
of Unsecured Creditors

By: s/ Gerard R. Luckman
Gerard R. Luckman
A Member of the Firm
100 Jericho Quadrangle, Suite 300
Jericho, New York 11753
(516) 479-6300